

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA
Plaintiff

v.

[1] WALTER PIERLUISI ISERN
Defendant, Third-Party Plaintiff

v

DEPARTAMENTO DEL TRABAJO Y
RECURSOS HUMANOS DEL GOBIERNO
DE PUERTO RICO
Third-Party Defendant

CIVIL: 3:24-cv-01334-CVR

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THIRD - PARTY COMPLAINT

I. The Parties of This Complaint

a. The Plaintiff:

Name: United States of America
Address: 350 Carlos Chardon st, Suite 1201
San Juan, Puerto Rico 00918
Telephone No. (787) 766-5656

b. The Defendant- Third- Party Plaintiff:

Name: Walter Pierluisi Isern
Address: P.O. Box 21487, San Juan
Puerto Rico 00928-1487
Telephone No. (787) 918-8845

c. The Third - Party Defendant:

Name: Departamento del Trabajo y Recursos Humanos
del Gobierno de Puerto Rico
Address: 505 Munoz Rivera Ave. 12 Floor
Prudencio Rivera Martinez Bldg.
Hato Rey 00918
Telephone No. (787) 754-5353

II. INITIAL COMPLAINT

1. On July 25, 2024 the United States Attorney Office for the District of Puerto Rico filed a complaint against co-defendant [1] Walter Pierluisi Isern and co-defendant [4] American Management and Administration Corporation to collect the 100% of the amount owed of restitution to the United States of America in the criminal case 3;23-cr-00148-CVR. See exhibit 1.

2. Co-defendant [1] Walter Pierluisi Isern filed an answer to the complaint on December 20, 2024. See exhibit 2.

III. THIRD- PARTY COMPLAINT

3. That co-defendant [4] American Management and Administration Corporation have a credit in the amount of \$ 555,898.06 for non-utilized premium as to fiscal year 2023, as part of the final liquidation of account No. 2895270000.

4. That the Third -Party defendant have to pay to Co-defendant[4] American Management and Administration Corporation the non-utilized premium as to fiscal year 2023, as part of the final liquidation the amount of \$ 555,898.06.

5. That money is an account receivable and are part of co-defendant [4] American Management And Administration Corporation assets, that are restrained by the Court due to the "Restraining Order" issued by this Court on July 29, 2024.

6. That co-defendant [4] American Management and Administration Corporation are entitled to judgment against the Third -Party Defendant to collect the amount owed.

7. That co-defendant[1] Walter Pierluisi Isern as owner and shareholder of co-defendant [4] American Management and Administration Corporation is entitled to request to this Court judgment against the Third-Party Defendant and will be economically affected if his Court denied his petition.

8. That co-defendant [1] Walter Pierluisi Isern request to this Court to issue a writ of garnishment against the Third-Party Defendant commanding the Third-Party Defendant to turn over the Plaintiff the amount owed to Co-defendant [4] American Management And Administration Corporation to be utilized as part of the restitution payment.

IV. PRAYER FOR RELIEF

Wherefore , co-defendant [1] Walter Pierluisi Isern prays that this claim be deemed

good and sufficient and that after due proceedings are had, that this Court enter judgment against the Third-Party Defendant and in favor of co-defendant [1] Walter Pierluisi Isern., and co-defendant [4] American Management and Administration Corporation to collect the amount of money owed.

V. CERTIFICATION

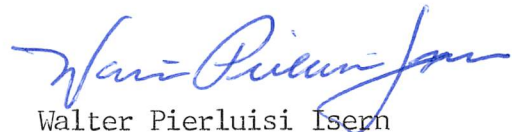
Under Federal Rules of Civil Procedures, by signing below, I certify to the best of my knowledge, information and belief that this complaint: (1) is not being presented for improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by nonfrivolous argument for extending, modifying or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of process will be executed as per Rule 4 of the Federal Rules of Civil Procedures and email addresses available as to all Third-Party Defendants herein.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on December 20 , 2024.



Walter Pierluisi Isern
Pro-se Defendant/Third-Party Plaintiff
P.O. Box 21487, San Juan,
Puerto Rico 00928-1487
(787) 918-8845